

EXHIBIT 68-16



**Dimitrov vs
Stavatti Aerospace**

Rudy Chacon

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Valentino Dimitrov, individually)	
and on behalf of all others)	
similarly situated,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	2:23-CV-00226-PHX-DJH
Stavatti Aerospace, Ltd, a)	
Minnesota corporation, et al.,)	
)	
Defendants.)	
_____)	

VIDEOCONFERENCE DEPOSITION OF RUDY CHACON

Phoenix, Arizona
January 21, 2025
1:21 p.m.

REPORTED BY:
TERESA A. WATSON, RMR
Certified Reporter
Certificate No. 50876

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1 Stavatti opportunity?

2 A. From Brian Colvin.

3 Q. Exclusively?

4 A. Yeah.

5 Q. From Brian Colvin?

6 A. Yeah.

7 Q. And as it pertains to all the other investors that you
8 had introduced, were all of those transactions facilitated by
9 Brian Colvin?

10 A. Yes.

11 Q. And other than this transaction -- "this transaction"
12 being the one with Valentino Dimitrov -- have -- has Brian
13 Colvin, to your knowledge, received any sort of compensation or
14 benefit from his fundraising efforts for Stavatti?

15 A. I'm not aware of anything that he received directly.
16 The only thing that I knew was that the 900,000 went into
17 Stavatti account number one, and the 100,000 went into the
18 Stavatti UAV account, from what I understood. But they were
19 both Stavatti accounts.

20 Q. Did you have any visibility into any of those
21 accounts?

22 A. No.

23 Q. And to your knowledge, the full amount was deposited
24 by Mr. Colvin, correct?

25 A. I went to the bank and made the deposit.



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1 Q. You made the deposit?

2 A. Yeah. With Brian Colvin.

3 Q. Okay. And at which bank location did you make that
4 deposit?

5 A. That was Bank of America San Pedro.

6 Q. And upon deposit, the -- just to confirm, upon
7 deposit, the amount was bifurcated with 100,000 in the UAV
8 account, and the remainder 900,000 in the other Stavatti
9 account, correct?

10 A. Correct.

11 Q. To your knowledge, did Mr. Colvin have signature
12 authority on either one of those accounts?

13 A. I don't know. I don't know.

14 Q. What was the nature of your conversation with
15 Mr. Colvin on that day leading up to the deposit?

16 A. We're going to go deposit the money. That was
17 basically the entire -- I mean, there wasn't any conversation
18 about it, because, I mean, I wasn't -- I wasn't made aware of
19 where the funds were going to be used immediately or anything
20 like that, so I didn't -- wasn't my -- wasn't my...

21 Q. So how do you know the way they were bifurcated?
22 Would you like to pause?

23 A. No. I'm just...

24 Q. How do you know the way --

25 A. Because -- because of the deposit, when the deposit



